

IMDG Code Amendment 36-12

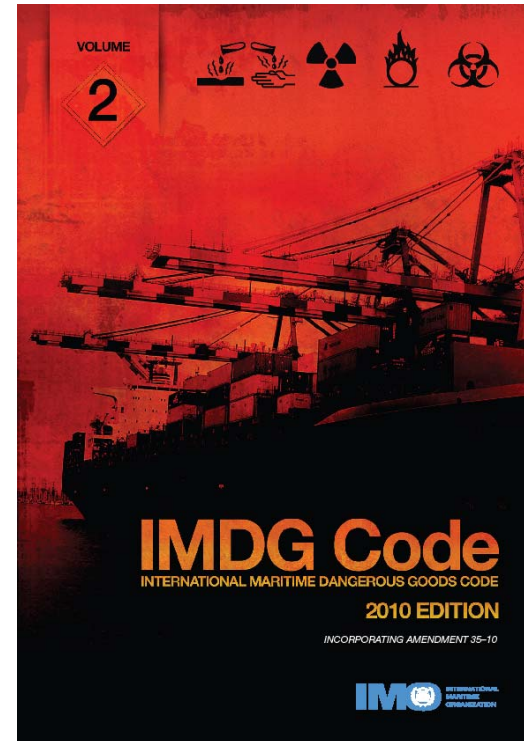
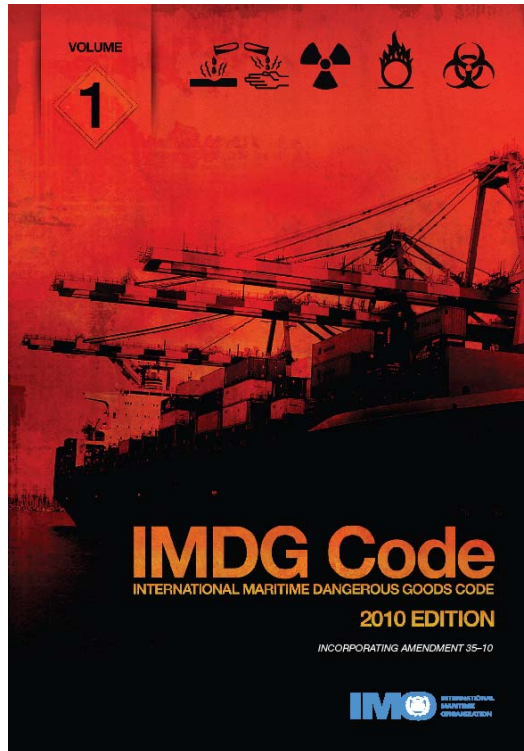
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IMDG Code Amendment 35-10



- Current edition of the IMDG Code
- Amdt 35-10 is the mandatory legal text until the 31st December 2013



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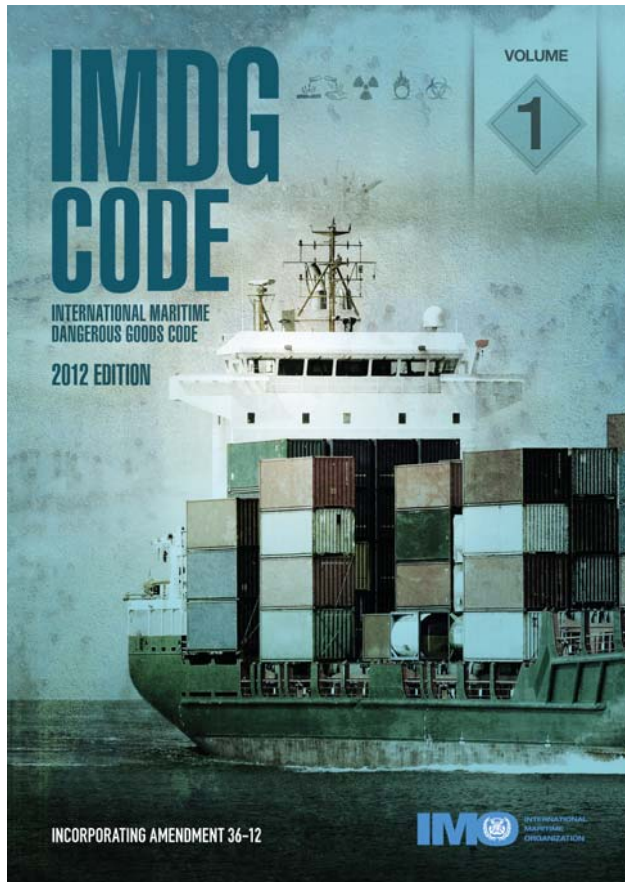
Amendments to the IMDG Code (amdt 36-12)

As a result of:

- Harmonisation with the non-mandatory United Nations Recommendations on the Transport of Dangerous Goods Regulations (17th revised edition)
- Maritime transport specific safety/clarification issues



IMDG Code Amendment 36-12



- Text was adopted in May 2012 at IMO
- It will be published in December 2012



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IMDG Code 2013

- 2013 is the transition year
- Amdt 35-10 is the mandatory legal text, in force until 31st December 2013
- Amdt 36-12 comes into force on a voluntary basis 1st January 2013 and it is mandatory from 1st January 2014
- In 2013 can use either Amdt 35-10 or Amdt 36-12 but “not mix and match” on the same consignment



Why different transition periods

- Can see the advantages of all the Modal bodies having the same transition/implementation dates
- However, the IMDG Code is made mandatory through the International Convention for the Safety of Life at Sea, 1974 (SOLAS) Convention, which covers all aspects of ship safety, and it would require a change to the timetable for Article VIII- Amendments of SOLAS to alter the transition period
- Whereas the European Agreement which brings ADR into force has different procedure which can more readily accommodate a shorter transition period. It is restricted to the international carriage of dangerous goods by road, but is applied to EU states through directive 2008/68/EU with the same transitional period.



Importance of Transition Periods

- Work started in September 2012 on IMDG Code amdt 37-14 and it will be completed Sept 2013. Final date for substantive submissions to IMO is July 2013
- Essential to look at the definitive texts for complete detail in order to determine implications to your organisation



IMDG Code Amendment 36-12

- Changes to Parts 1- 6 reflect UN harmonisation and any mode specific safety or trade facilitation issues
- Unfortunately, whilst every effort is made to ensure that the modal Regulations co-ordinate any changes, differing meeting schedules and modal priorities can give rise to occasional variations
- Part 7 of IMDG Code is primarily mode specific requirements



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- The changes will be given as follows:
Harmonisation with UN 17th revised edition
- IMDG Code amendment 36-12 specific



Harmonisation with UN 17th revised edition

- New security provision thresholds for radioactive materials
- Clarified that standards do not take precedence over regulations.
- 1.4S explosives UN 0012, 0014 & 0055 (small arms cartridges etc) can be carried as Limited Quantities (maximum quantity per pack 5kg).



Harmonisation with UN 17th revised edition

- New entries for; Krill meal; Iodine monochloride, liquid, ; Nickel-metal hydride batteries (entry already in IMDG Code 35-10)
- Toxic subsidiary risk for mercury, but new provisions for mercury contained in manufactured articles not more than 1kg (UN3506 SP366).



Harmonisation with UN 17th revised edition

- Provisions for chemicals under pressure in packagings and tanks adopted (6 new entries; P206; T50).



Harmonisation with UN 17th revised edition

- SP296 addition exempts UN 2990 & 3072 life-saving appliances in strong outer packagings of 40kg gross mass with no DGs other than 2.2 compressed or liquefied gases with no sub risk capacity less than 120ml.



Harmonisation with UN 17th revised edition

- Minimum height for UN No./Proper Shipping Name:
on packages including IBCs- 12mm;
for those less than 30 l/kg 6mm
for 5 l/kg or less - ' of an appropriate size'.
- Stack height mark for IBCs in transport from 1 January 2011 – causing problems in storage.
- Stack height mark for Large Packagings from 1 January 2015.



Harmonisation with UN 17th revised edition

- Major revision of classification test methods for lithium batteries and cells adopted (Manual of Test & Criteria)
- Discussions on provisions for used/damaged lithium batteries started.
- Clarified that labels required in addition to EHS mark.





Use of Flexible
bulk containers (BK3)
adopted in
UN17th Model Regulations



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Flexible bulk containers (BK3)

- ADR - Flexible bulk container (BK3) provisions permitting up to 15 m³ of certain PGIII solids were not adopted
- IMDG Code - BK3 are only allowed in the holds of general cargo ships. They are not allowed to be transported in cargo transport units



Harmonisation with UN 17th revised edition

- New Special Provision 363 applied to UN No.s 1202, 1203, 1223, 1268, 1863 and 3475 when containment is integral to equipment or machinery (e.g. generators, compressors, heating units, etc)



Harmonisation with UN 17th revised edition

- IMDG Code deviations, LQ limit to 450 litre capacity: one label and mark is required on the outside of the machinery or equipment, not the means of containment.
- Between 450-1500 litre: labelled and marked on all four external surfaces
- Above 1500 litre of substance only with Competent Authority Approval



IMDG Code amendments

- The minimum size for the UN number on cylinders of 60 litres water capacity or less of at least 6mm applied from 1 January 2018.
- The term 'marine pollutant/ environmentally hazardous' permitted on the transport document.



IMDG Code Amdt 36-12

- Part 2 Classification
- A new 2.0.5 Transport of Wastes
Formerly chapter 7.8, reflecting the UN Model Regulations approach of it being a classification issue
- A new 2.9.4 Lithium batteries – bringing together criteria for assigning to UN Nos 3090, 3091, 3480 and 3481



IMDG Code Amdt 36-12

- Chapter 3.4 Limited Quantities
- The layout of the chapter has been revised – UN harmonisation
- No substantial changes e.g. If LQ is a Marine Pollutant it still needs to be declared on the transport document
- Clarification given on placarding requirements to avoid delays through differing interpretations



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The IMDG Code was originally developed in the days of general cargo ships and to reflect the changes of cargo being carried on Ro-Ro and Container ships. The text of Part 7 has been totally revised



IMDG Code Amdt 36-12 Part 7

- As the Part 7 Provisions concerning transport have been totally revised, a conversion table has been produced
- MSC .1/Circ.1439 Conversion table giving details of former and new section numbers



IMDG Code Amdt 36-12 Part 7

- Chapter 7.1 General stowage provisions
 - Stowage - Placement on board ship
 - 7.1.2 Definitions
- Terms used have been clarified e.g. Clear of Living Quarters
- The term “magazine” is no longer used in the context of the IMDG Code



IMDG Code Amdt 36-12 Part 7

- Chapter 7.2 General segregation provisions
- Segregation is the process of separating two or more goods
- New annex - Segregation flow chart



IMDG Code Amdt 36-12 Part 7

- All shore side related activities in one chapter
- Packing cargo CTUs
- Segregation within CTUs
- Segregation in CTUs in relation to foodstuffs (Foodstuffs are now defined in Chapter 1.2 Definitions)
- CTUs under temperature control



IMDG Code Amdt 36-12 Part 7

- Chapter 7.4 Stowage and segregation on containerships
- Chapter 7.5 Stowage and segregation on ro-ro ships
- Illustrations used for familiarisation and training purposes in Chapters 7.4 and 7.5 now given MSC. 1/Circ.1440



IMDG Code Amdt 36-12 Part 7

- Chapter 7.6 Stowage and segregation on general cargo ships
- Chapter 7.7 Ship-borne barges on barge-carrying ships
- Chapter 7.8 Special requirements in the event of an incident and fire precautions involving dangerous goods
- Chapter 7.9 Exemptions, approvals and certificates



IMDG Code Amdt 36-12 Part 7

- Chapter 7.8 Special requirements in the event of an incident and fire precautions involving dangerous goods
- A printed amended supplement will not accompany Amdt 36-12, however MSC.1/Circ.1438 (dated 25 May 2012), Amendments to the Emergency Response Procedures for Ships Carrying Dangerous Goods (EmS Guide) (available via MCA website), gives the consequential amendments to the 2010 edition of the IMDG Code Supplement and will come into force on the same basis as amendment 36-12 of the IMDG Code.
- Chapter 7.9 Exemptions, approvals and certificates



CONCLUSION

- Must look at the definitive texts for complete detail in order to plan ahead and ensure compliance.
- Make sure your customers are aware of forthcoming changes to avoid issues when Amdt 36-12 becomes mandatory 1st January 2014.
- Make sure MCA is aware of your views – it does help shape decision making!



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